

**From:** [Smith, Tobias](#)  
**To:** [Powers, Emily \(ENRD\) \(Emily.Powers@usdoj.gov\)](#); [Quinones, Edwin](#)  
**Subject:** FW: Star Lake Canal PRP Search (Email 2 of 2)  
**Date:** Wednesday, March 29, 2017 8:10:04 PM  
**Attachments:** [Nexus Summaries to the Star Lake Canal Site 3.29.17.pdf](#)

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Emily & Ed: Finally, the slide Summary is attached.

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**From:** Smith, Tobias  
**Sent:** Wednesday, March 29, 2017 7:17 PM  
**To:** [quinones.edwin@epa.gov](mailto:quinones.edwin@epa.gov); Powers, Emily (ENRD) (Emily.Powers@usdoj.gov)  
**Subject:** Star Lake Canal PRP Search

Emily & Ed:

On behalf of the Star Lake Canal Cooperating Parties Group, I am sharing the following attached documents for your review and consideration in evaluating additional PRPs at the Site:

- Summary Slide deck of PRP connections to the Site
- Nexus Report for Riverside Chemical
- Corporate History Chart for Riverside Chemical demonstrating flow of liability to CF Industries Holdings, Inc. and ServiceMaster Global Holdings, Inc.
- Nexus Report for Shell Pipe Line
- Nexus Report for Jefferson County Mosquito Control Division

We have previously provided you with Nexus Reports for ARCO/BP and TOTAL Petrochemicals, review of which we hope can be expedited for timing with our negotiations with these parties. Finally, during our conference call, we discussed the role of the US Army Corps of Engineers (USACE) in constructing the canal and levee that runs through the Site. While we see a clear connection giving rise to CERCLA liability for USACE at the Site, we are still in the process of analyzing the available evidence concerning USACE's activities and we will forward the USACE Nexus Report upon completion.

Thank you for your consideration of the evidence we have gathered concerning these additional PRPs. We remain available to address any questions that may arise as you conduct your own analysis and can provide you with source documentation upon request. We look forward to seeing these parties named as PRPs and notice letters issued to ensure their participation in the Site.

Best regards,

Tobias Smith

Common Counsel to Star Lake Canal Cooperating Parties Group

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